

Summary of Stakeholders' Comments

On March 31, 2004, NRC conducted a stakeholders' meeting, open to the public, to inform stakeholders of the status and progress of the pilot projects and receive feedback on the future National Materials Program (NMP). The meeting was transcribed and a copy of the transcription is available at <http://www.hsrdoornl.gov/nrc/materials/0331NRC1397.pdf>. Comments received at the stakeholders' meeting, and those subsequently submitted by letter fell roughly into 4 broad areas:

- Structure/Organization and Infrastructure
- Jurisdiction and Policies
- Implementation/Integration of Current Programs
- Future Issues for Consideration

A more detailed description of the types of comments for each area follows:

STRUCTURE/ORGANIZATION AND INFRASTRUCTURE

- Determine how and when to involve external stakeholders.
- Define the NMP mission, purpose, organizational structure in plain English.
- Evaluate and prioritize regulatory oversight for cross-jurisdictional activities
- Establish NMP short, medium and long term goals.
- Coordinate NMP operations with NRC and State budget preparation activities
- Communicate NMP organization and purpose outside NMP.

JURISDICTION AND POLICIES

- Develop and implement a unified risk informed, performance based regulatory foundation for materials safety and waste disposal.
- Blend OAS, CRCPD, State and Federal programs and practices into a consistent, comprehensive national risk-based program.
- Establish performance measures/metrics to assess program effectiveness.
- Apportion regulation and oversight activities to appropriate regulatory bodies - some issues may be best addressed by the Agreement States, while others are best handled by the NRC, i.e., physical security.
- Increase the sharing of information and tools among affected organizations.
- Develop and communicate common goals and priorities to external stakeholders.
- Solicit and consider external stakeholder input on policy/program development.

IMPLEMENTATION/INTEGRATION OF CURRENT PROGRAMS

- Apply risk informed performance based regulatory principles to more aspects of materials safety.

- Share licensing, operating and inspection experiences among regulators and the regulated community, i.e., lessons learned from State regulatory activities and event notifications.
- Evaluate staff certification/training requirements for appropriate radiation workers (establish a national standard?).

FUTURE ISSUES FOR CONSIDERATION

- Consider sharing resources to address emergent issues.
- Are there other available resources - consider using professional societies.
- How should NMP address physical security issues?
- How best to oversee manufacturing and distribution activities?
- Could an IMPEP-like process be used to assess other types of programs?
- How to handle NORM?
- What about PET in Non-Agreement States?
- Periodically reassess radiation regulations/standards.